

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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*ATTORNEYS FOR DEBTOR*

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No.: 21-30589 (MBK)

Judge: Michael B. Kaplan

**NOTICE OF AGENDA OF MATTERS SCHEDULED  
FOR HEARING ON MAY 4, 2022 AT 10:00 A.M.**

*Parties are directed to <https://www.njb.uscourts.gov/LTL>  
for appearing via Court-Solutions or in-person, or observing via zoom*

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**MATTERS NOT GOING FORWARD**

1. Debtor's Motion for an Order Authorizing Establishment of a Qualified Settlement Fund for Payment of Talc Claims [Dkt. 8].

**Status: This matter has been adjourned to the June 14, 2022 hearing.**

2. Debtor's Motion for an Order (A) Authorizing the Filing Under Seal of Certain Confidential Commercial Information in Connection with the Debtor's Motion for an Order Authorizing Establishment of a Qualified Settlement Fund for Payment of Talc Claims and (B) if Necessary, In Camera Hearing [Dkt. 9].

**Status: This matter has been adjourned to the June 14, 2022 hearing.**

3. Application of the Official Committee of Talc Claimants for Retention of Houlihan Lokey Capital, Inc. as Investment Banker Under Bankruptcy Code Section 328(a) Effective as of December 17, 2021 [Dkt. 953].

**Status: This matter has been adjourned to the May 24, 2022 hearing.**

4. Application of the Official Committee of Talc Claimants for Retention of FTI Consulting, Inc. as Financial Advisor Effective December 13, 2021 [Dkt. 954].

**Status: This matter has been adjourned to the May 24, 2022 hearing.**

5. Kirk Williams Motion for Qualified Settlement Fund [Dkt. 1932].

**Status: This matter has been adjourned to the June 14, 2022 hearing.**

6. Amended Interim Order Authorizing retention of The Brattle Group, Inc. as Talc Consultants to the Official Committee of Talc Claimants I [Dkt. 2124].

**Status: This matter has been adjourned to the May 24, 2022 hearing.**

**CONTESTED MATTERS GOING FORWARD**

7. Travelers Casualty and Surety Company's Motion for an Order Adding Travelers as a Mediation Party or, in the Alternative, Modifying the Mediation Order [Dkt. 1900] (the "Travelers' Motion").

**Status: This matter is going forward.**

Objection Deadline: April 27, 2022

Related Documents:

- A. Order Establishing Mediation Protocol [Dkt. 1780] (the "Mediation Protocol").

- B. Travelers Casualty and Surety Company's Motion to Seal the Memorandum of Law in Support of Travelers' Motion for an Order Adding Travelers as a Mediation Party or, in the Alternative, Modifying the Mediation Order and Certain Accompanying Exhibits [Dkt. 1901] (the "Travelers' Motion to Seal").
- C. Application for Order Shortening Time [Dkt. 1902].
- D. Century Insurers' Joinder to the Travelers' Motion [Dkt. 1903].
- E. Order Shortening Time Period for Notice, Setting Hearing and Limited Notice [Dkt. 1905].
- F. Corrected Order Shortening Time Period for Notice, Setting Hearing and Limited Notice [Dkt. 1919].
- G. Republic Indemnity of America's Joinder to the Travelers' Motion [Dkt. 1956].
- H. New Jersey Coverage Action Plaintiff-Insurers' Joinder to the Travelers' Motion [Dkt. 1959].
- I. Arrowood Indemnity Company's Joinder to the Travelers' Motion [Dkt. 1985].
- J. Allianz Insurers' Joinder to the Travelers' Motion [Dkt. 1998].
- K. Allstate Insurance Company, Solely as Successor in Interest to Northbrook Excess & Surplus Insurance Company, Formerly Northbrook Insurance Company's, Limited Joinder to the Travelers' Motion [Dkt. 2005].
- L. Sentry Insurance Company as Assumptive Reinsurer of Great Southwest Fire Insurance Company Joinder to the Travelers' Motion [Dkt. 2025].
- M. DiSanto Canadian Class Action Plaintiffs' Joinder to the Travelers' Motion [Dkt. 2027] (the "DiSanto Motion").
- N. TIG Insurance Company and Everest Reinsurance Company Joinder to the Travelers' Motion [Dkt. 2052].
- O. Baker Canadian Class Action Claimants' Objection to the DiSanto Motion [Dkt. 2175].
- P. Official Committee of Talc Claimants Limited Objection to the DiSanto Motion [Dkt. 2180].
- Q. United States Trustee Objection to Travelers' Motion to Seal [Dkt. 2183].
- R. Debtor's Reservation of Rights With Respect to Motions Seeking Relief With Respect to the Order Establishing Mediation Protocol [Dkt. 2185] (the "Debtor's ROR").

Objections Received: None.

8. Travelers' Motion to Seal.

**Status: This matter is going forward.**

Objection Deadline: April 27, 2022

Related Documents:

- A. The Travelers' Motion.

Objections Received:

- B. United States Trustee Objection to Travelers' Motion to Seal [Dkt. 2183].

9. United States Trustee's Motion Pursuant to Fed. R. Bank. 9023 and 9024 Seeking Relief With Respect to the Order Establishing Mediation Protocol [Dkt. 1912].

**Status: This matter is going forward.**

Objection Deadline: April 27, 2022

Related Documents:

- A. The Mediation Protocol.

- B. Application for Order Shortening Time [Dkt. 1913].

- C. Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice [Dkt. 1920].

- D. The Debtor's ROR.

- E. The DiSanto Motion.

- F. Baker Canadian Class Action Claimants' Objection to the DiSanto Motion [Dkt. 2175].

Objections: None.

10. Ad Hoc Committee of States Holding Consumer Protection Claims Seeking Relief With Respect to the Order Establishing Mediation Protocol [Dkt. 1939].

**Status: This matter is going forward.**

Objection Deadline: April 27, 2022

Related Documents:

- A. The Mediation Protocol.
- B. Application for Order Shortening Time [Dkt. 1941].
- C. Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice [Dkt. 1943].
- D. The Debtor's ROR.

Objections: None.

11. Claimant Shirleeta Ellison's Motion for an Order Appointing Ms. Ellison to the Official Committee of Talc Claimants [Dkt. 1963].

**Status: This matter is going forward.**

Objection Deadline: April 27, 2022

Related Documents:

- A. Application for Order Shortening Time [Dkt. 1968].
- B. Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice [Dkt. 1969].
- C. Supplemental Motion of Claimant Shirleeta Ellison for Modification of the Official Committee of Talc Claimants [Dkt. 2128].

Objections:

- D. Response of the United States Trustee to the Various Motions for Appointment to the Official Committee of Talc Claimants [Dkt. 2062] (the "UST Response").
- E. Objection of Mesothelioma Plaintiffs Represented by Kazan, McClain, Satterley & Greenwood to Motion of Claimant Shirleeta Ellison for Appointment to the Official Committee of Talc Claimants [Dkt. 2070].
- F. Debtor's Preliminary Response to Motions to Alter Membership of the Official Committee of Talc Claimants [Dkt. 2071] (the "Debtor's Response").
- G. Response and Statement of the Official Committee of Talc Claimants to Committee Membership Related Motions Set for May 4, 2022 Hearing [Dkt. 2182] (the "TCC Response").

- H. Debtor's Supplemental Response to Motions to Alter Membership of the Official Committee of Talc Claimants [Dkt. 2184] (the "Debtor's Supplemental Response").
- 12. Claimant Brandi Carl's Motion for an Order Appointing Ms. Carl to the Official Committee of Talc Claimants [Dkt. 2018].

**Status: This matter is going forward.**

Objection Deadline: April 27, 2022

Related Documents:

- A. Application for Order Shortening Time [Dkt. 2019].
- B. Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice [Dkt. 2021].
- C. Supplement to Motion of Claimant Brandi Carl Regarding the Composition of the Official Committee of Talc Claimants [Dkt. 2126].

Objections Received:

- D. The UST Response.
  - E. The Debtor's Response.
  - F. Objection of Maune Raichle Hartley French & Mudd, LLC, to Motion of Certain Ovarian Cancer Claimants for Appointment to the Official Committee of Talc Claimants [Dkt. 2172] (the "MRHFM Objection").
  - G. The TCC Response.
  - H. The Debtor's Supplemental Response.
13. Aylstock, Witkin, Kreis & Overholtz, PLLC's Motion for Order Regarding the Composition of the Official Committee of Talc Claimants [Dkt. 2029].

**Status: This matter is going forward.**

Objection Deadline: April 27, 2022

Related Documents:

- A. Application for Order Shortening Time [Dkt. 2030].
- B. Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice [Dkt. 2047].

- C. Supplemental Statement of Aylstock, Witkin, Kreis & Overholtz, PLLC in Support of Motion for an Order Regarding the Composition of the Official Committee of Talc Claimants [Dkt. 2131].

Objections Received:

- D. The UST Response.
  - E. The Debtor's Response.
  - F. The MRHFM Objection.
  - G. The TCC Response.
  - H. The Debtor's Supplemental Response.
14. Claimant Giovanni Sosa's Motion for an Order Appointing Mr. Sosa to the Official Committee of Talc Claimants [Dkt. 2041].

**Status: This matter is going forward.**

Objection Deadline: April 27, 2022

Related Documents:

- A. Application for Order Shortening Time [Dkt. 2042].
- B. Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice [Dkt. 2048].
- C. Supplement to Motion of Giovanni Sosa for Consideration of His Appointment to the Official Committee of Talc Claimants [Dkt. 2134].
- D. Reply of Giovanni Sosa to the Response of Debtor LTL Management LLC [Dkt. 2209].

Objections Received:

- E. The UST Response.
- F. The Debtor's Response.
- G. The TCC Response.
- H. The Debtor's Supplemental Response.

15. Claimant Evan Plotkin's Motion for an Order Appointing Mr. Plotkin to the Official Committee of Talc Claimants [Dkt. 2043].

**Status: This matter is going forward.**

Objection Deadline: April 27, 2022

Related Documents:

- A. Application for Order Shortening Time [Dkt. 2044].
- B. Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice [Dkt. 2050].
- C. Supplement to Motion of Evan Plotkin for Consideration of His Appointment to the Official Committee of Talc Claimants [Dkt. 2136].

Objections Received:

- D. The UST Response.
  - E. The Debtor's Response.
  - F. The TCC Response.
  - G. The Debtor's Supplemental Response.
16. Debtor's Second Motion for Entry of an Order Pursuant to 11 U.S.C. § 1121(d) Extending the Exclusive Periods to File a Plan of Reorganization and Solicit Acceptances Thereof [Dkt. 2095] (the "Exclusivity Motion").

**Status: This matter is going forward.**

Objection Deadline: April 27, 2022

Related Documents:

- A. Debtor's Reply in Support of the Exclusivity Motion [Dkt. 2205].
- B. The Official Committee of Talc Claimants' Objection to the Exclusivity Motion [Dkt. 2181].

Dated: May 2, 2022

**WOLLMUTH MAHER & DEUTSCH LLP**

/s/ Paul R. DeFilippo

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